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Attorneys for Plaintiffs,

15 RICHARD FLIER and

16 PATRICIA FLIER

17  
18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**

20 RICHARD FLIER and PATRICIA  
21 FLIER,

22 Plaintiffs,

23 vs.

24 FCA US, LLC; and DOES 1 through  
10, inclusive,

25 Defendants.

Case No. 3:21-cv-02553-CRB

(Removed from Superior Court of  
California, County of Contra Costa,  
Case No. MSC20-02177)

*Assigned for All Purposes to the  
Honorable Charles R. Breyer*

**JOINT STIPULATION TO AMEND  
SCHEDULING ORDER : ORDER**

State Court Complaint Filed:  
April 14, 2020

Trial Date: TBD

**TO THE HONORABLE COURT:**

Plaintiffs RICHARD FLIER and PATRICIA FLIER (“Plaintiffs”) and Defendant FCA US, LLC (“FCA”) (collectively, the “Parties”), by and through their respective attorneys of record, hereby stipulate and agree to request that the Court amend the scheduling order as follows:

WHEREAS, the Parties filed a Joint Case Management Statement on May 23, 2022;

WHEREAS, the Court issued a Case Management Scheduling Order on May 24, 2022, setting the following deadlines:

Close of Fact Discovery by 7/22/2022;

Motions deadline of 9/5/2022;

Close of Expert Discovery by 10/10/2022;

Joint Case Management Statement by 10/21/2022;

Case Management Conference set for 10/28/2022;

WHEREAS, Gordon Rees Scully Mansukhani LLP substituted in as new counsel for FCA on July 12, 2022;

WHEREAS, FCA’s new counsel needs further and additional time and opportunity to review the materials and learn and understand the specific issues in this matter;

WHEREAS the Parties attempted to be diligent in conducting discovery, but discovery issues remain, including but not limited to specifically, that Plaintiffs’ depositions still need to be completed as they were originally set for April 19, 2022 but due to unforeseen circumstances had to be cancelled by prior counsel;

WHEREAS after completion of fact discovery, the Parties will require deposition of each parties’ expert witnesses regarding outstanding matters;

WHEREAS, there is no trial date set, and the Parties have not previously continued the trial date or related deadlines.

WHEREAS, the Parties have agreed to jointly stipulate to request the Court amend the scheduling order and continue the deadlines as follows:

Close of Fact Discovery by 10/24/2022;

Last day to serve Initial Expert report by 11/7/2022;

Last day to serve Rebuttal Expert report by 11/21/22;

Motions deadline of 2/9/2023;

Close of Expert Discovery by 3/10/2023;

Joint Case Management Statement by 10/21/2022;

Case Management Conference set for 10/28/2022;

WHEREAS, the Parties agree that it is in their best interests, and that of the Court's judicial resources, to amend the Scheduling Order and continue deadlines so that the Parties have sufficient time to complete fact and expert discovery and prepare for trial, while pursuing a settlement of the claims;

NOW THEREFORE, IT IS HEREBY STIPULATED, and Counsel for the Parties do hereby jointly request and stipulate, to request that the Court amend the scheduling order and continue the deadlines, and any associated deadlines, as outlined above.

Dated: July 15, 2022      GORDON REES SCULLY MANSUKHANI, LLP

/s/ Greg Gruzman  
Spencer P. Hugret  
Hailey Rogerson  
Greg Gruzman  
Ali Azemoun  
Attorneys for Defendant  
FCA US LLC

Dated: July 15, 2022      STRATEGIC LEGAL PRACTICES, APC

/s/ Ariel Harman-Holmes  
Tionna Dolin  
Ariel Harman-Holmes  
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Attorneys for Plaintiffs,  
RICHARD FLIER and  
PATRICIA FLIER

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

RICHARD FLIER and PATRICIA  
FLIER,

Plaintiffs,

vs.

FCA US, LLC; and DOES 1 through  
10, inclusive,

Defendants.

) Case No. 3:21-cv-02553-CRB

) ~~PROPOSED~~ ORDER GRANTING  
) JOINT STIPULATION TO AMEND  
) SCHEDULING ORDER

) Sup.Ct. Complaint: April 14, 2020  
) Removal Date: April 8, 2021  
) Judge: Charles R. Breyer

[PROPOSED] ORDER GRANTING JOINT STIPULATION TO AMEND  
SCHEDULING ORDER

**[PROPOSED] ORDER**

The Court, having considered the Joint Stipulation to Amend the Scheduling Order filed by the Parties, and upon finding that good cause exists, hereby ORDERS:

The Scheduling Order deadlines are amended as follows:

1. Close of Fact Discovery by 10/24/2022;
2. Last day to serve Initial Expert report by 11/7/2022;
3. Last day to serve Rebuttal Expert report by 11/21/22;
4. Motions deadline of 2/9/2023;
5. Close of Expert Discovery by 3/10/2023;
6. Joint Case Management Statement by 10/21/2022;
7. Case Management Conference set for 10/28/2022;

**PURSUANT TO STIPULATION,  
IT IS SO ORDERED.**

Dated: July 18, 2022

  
\_\_\_\_\_  
HON. CHARLES R. BREYER  
UNITED STATES DISTRICT COURT JUDGE

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275 Battery Street, Suite 2000  
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FCA US LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

RICHARD FLIER and PATRICIA  
FLIER,

Plaintiff,

vs.

FCA US LLC, and DOES 1 through 10,  
inclusive,

Defendants.

Case No. 3:21-cv-02553-CRB

**CERTIFICATE OF SERVICE**

Sup.Ct. Complaint: April 14, 2020  
Removal Date: April 8, 2021  
Judge: Charles R. Breyer

I am employed in the County of San Francisco, State of California. I am over the age of 18 and not a party to the within action. My business address is 275 Battery Street, 20<sup>th</sup> Floor, San Francisco CA 94111.

On the date set forth below, I served on the party listed below the foregoing document(s) described as:

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